

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.⁴

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE COMMONWEALTH OF
PUERTO RICO,

as agent of

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

BETTINA WHYTE,

as agent of

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO SALES TAX FINANCING
CORPORATION,

Defendant.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Adv. Proc. No. 17-00257-LTS

⁴ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.

ORDER ON URGENT MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Upon consideration of the motion (the “Motion”) of the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) for an order authorizing the public filing of the following documents with the bank account numbers stated therein redacted:

- *The COFINA Agent’s Reply to the Commonwealth Agent’s Counter-Statement of Additional Undisputed Material Facts* [ECF No. 401] (“COFINA Agent’s Reply Statement”);
- *The Reply Statement of Undisputed Material Facts of the COFINA Senior Bondholders’ Coalition* [ECF No. 389] (“Senior Bondholders’ Reply Statement”);
- *Mutual Fund Group and Puerto Rico Funds’ Response to Commonwealth Agent’s Counter-Statement of Additional Undisputed Facts* [ECF No. 395] (“Mutual Fund Groups’ Reply Statement”);

and it appearing that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 and 48 U.S.C. § 2166(a); (ii) that venue of this proceeding and the Motion is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a); and (iii) that notice of the Motion was adequate and proper under the circumstances and that no further or other notice need be given; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. The COFINA Agent’s Reply Statement [ECF No. 401], the Senior Bondholders’ Reply Statement [ECF No. 389], and the Mutual Fund Groups’ Reply Statement [ECF No. 395] shall be publicly filed with the bank account numbers redacted. The respective parties shall take actions necessary to file redacted copies of these

documents and replace the existing versions of ECF Nos. 401, 389, and 395 as provided for by this paragraph.

3. The Court, as well as the following counsel for parties in this case who have agreed to be bound by the Stipulation and Order for the Production and Exchange of Confidential Information, entered on October 10, 2017 [ECF No. 56], shall have access to the unredacted versions of all documents filed under seal:

The Official Committee of Unsecured Creditors of the Commonwealth of Puerto Rico, as agent of The Commonwealth of Puerto Rico
c/o Paul Hastings LLP
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212-318-6000

Bettina Whyte, as agent of the Puerto Rico Sales Tax Financing Corporation
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Ad Hoc Group of General Obligation Bondholders
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4. The Court shall retain jurisdiction to hear and determine all matters arising from
the implementation of this Order.

Dated: _____
San Juan, Puerto Rico

LAURA T. SWAIN
United States District Judge